



April 11, 2023

Via ECF

Hon. James M. Wicks
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: *See v. Government Employees Insurance Company, et al.*
Case No. 2:21-cv-547-PKC-JMW

Dear Magistrate Judge Wicks:

The parties submit the following competing schedules for the Court's consideration at the April 13, 2023, scheduling conference.

Event	Deadline – Plaintiffs' Proposal	Deadline - Defendants' Proposal
Fact discovery related to class certification	October 26, 2023	January 19, 2024
Plaintiffs' expert reports for class certification	December 14, 2023	February 16, 2024
Defendants' expert reports for class certification	February 15, 2024	April 19, 2024
Depositions of experts for class certification	March 29, 2024	May 31, 2024
Deadline for Plaintiffs to move for class certification	April 18, 2024	June 28, 2024
Deadline for Defendants to oppose class certification	May 30, 2024	August 16, 2024
Deadline for Plaintiffs to reply in support of motion for class certification	June 27, 2024	September 20, 2024
Class Certification Hearing	TBD following briefing	TBD following briefing

Respectfully submitted,

A handwritten signature in blue ink that reads "Lee Lowther". The signature is written in a cursive, flowing style.

Lee Lowther

cc: Counsel of record (via ECF)